IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

Civil Action No.: 1:15-cv-10181-DJC

ARDUINO, LLC,

Plaintiff,

-V-

ARDUINO S.R.L. f/k/a SMART PROJECTS S.R.L.; GHEO SA; CC LOGISTICS, LLC; MAGYC NOW LTD; DOG HUNTER INC.; DOG HUNTER LLC; DOG HUNTER AG; TULYP HOLDING SA; GIANLUCA MARTINO; FEDERICO MUSTO; and DOES 1-10,

Defendants.

JOINT NOTICE OF ANTICIPATED SETTLEMENT AND JOINT MOTION TO STAY DISCOVERY DEADLINES

Plaintiff Arduino, LLC, together with Defendants Arduino S.r.l., Gheo SA, CC Logistics, LLC, Dog Hunter LLC, Gianluca Martino, and Federico Musto, (collectively the "Parties"), submit this Notice of Anticipated Settlement and Motion to Stay Discovery Deadlines.

The Parties hereby inform the Court that they have made substantial progress in reaching an agreement to resolve this matter and are presently working on the provisions of a formal settlement agreement. Upon execution thereof, the Parties shall file a stipulation for dismissal as required by the Local Rules of this Court. In the meantime, the Parties request that the Court stay all deadlines in this Action for a specified period of thirty (30) days. The parties will notify the Court regarding the status of settlement at that time.

¹ Not all named defendants were served or have appeared in this matter; upon information and belief, the settlement discussed herein will resolve this matter as to all named defendants.

Respectfully submitted,

Dated: April 25, 2016

/s/ Michael P. Boudett

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